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November 6, 2012

BY HAND

The Honorable Robert E. Payne
United States District Court for the
Eastern District of Virginia
Federal Courthouse - Room 3000
701 East Broad Street
Richmond, Virginia 23219

**Re: ePlus, Inc. v. Lawson Software, Inc.
Civil Action No. 3:09cv620**

Dear Judge Payne:

Lawson Software, Inc.'s ("Lawson") November 1, 2012 letter to the Court submitting eight withheld documents from the privilege log identified in ePlus, Inc.'s ("ePlus") reply brief in support of its motion to enforce and ten such documents identified in Lawson's brief on the motion followed up on a proposal Lawson's counsel made during argument to the Court. 10/24/12 Tr. at 67:13-16 ("It's the ones that are in their reply brief. It's the documents that were identified in their brief that we have not produced and the documents that we identified that were on their log that we say [do not] have anything to do with development"). The documents submitted are exactly the categories stated on the record by Mr. Thomasch, although the number of documents cited in the identified portions of the briefs are actually fewer than the number Mr. Thomasch stated in court.

Mr. Robertson's November 5 letter states that Lawson "ignored" seven ePlus examples in making the submission. That statement is not correct. The log numbers in Mr. Robertson's November 5 letter were not cited in the motion briefing. They were first brought to the Court's attention on the motion as they were identified, serially, in oral argument. Lawson's proposal to the Court had been to submit documents that were previously identified in the briefs and that is exactly what Lawson did.

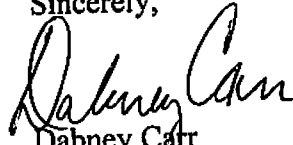
If, however, the Court would like to have these additional seven documents ePlus identified submitted as further background to the motion, Lawson will make them available for the court's *in camera* review.

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With kind regards, I am

Sincerely,



Dabney Carr

Enclosure

cc: Counsel of Record *(by email)*